

# **Exhibit 3**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ABC Corporation I et al,

*Plaintiff,*

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

*Defendants.*

**CASE NO.** 1:20-cv-04806

**Judge:** Honorable Thomas M. Durkin

**DECLARATION OF XIE RONGQING**

I, Xie Rongqing, declare as follows:

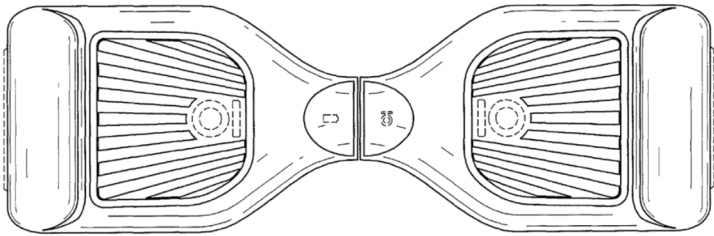
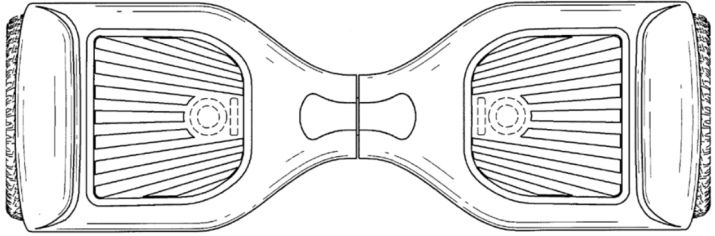
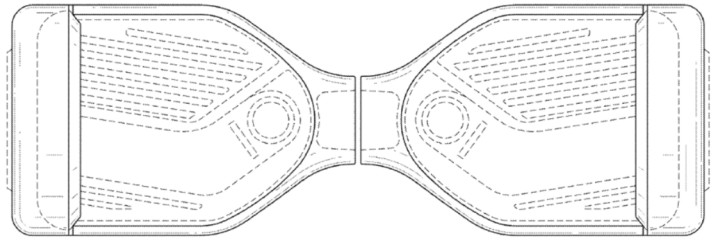
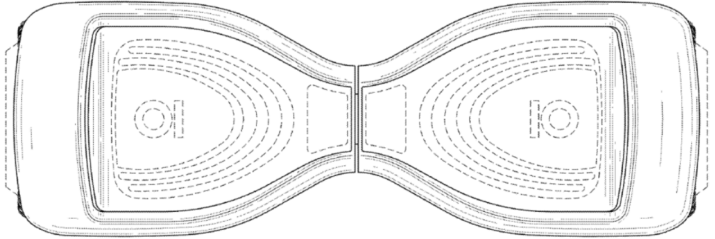
1. I am over eighteen (18) years of age. I make this affidavit based on my own knowledge.
2. I am the owner of Dongguan Saibotan Nengyuan Keji (Energy Tech) Co. Ltd. ("Dongguan Saibotan"), which owns and operates the Amazon storefront Gyroor-US.
3. I have been in the business of manufacturing and marketing hoverboards for over 7 years.
4. I am very familiar with the exterior design of different types of hoverboards.
5. The accused product in this case is designed based on the D808,857 patent, which Dongguan Saibotan is authorized to use.
6. The accused product is different from the design in D737,723, D738,256, D785,112, D784,195 patents. The pattens on the standing pads, the wheels, the fenders, and other details are all different.
7. I highlighted some of the differences between the accused product and the D737,723, D738,256, D785,112, D784,195 patents from different angles in the comparison below.

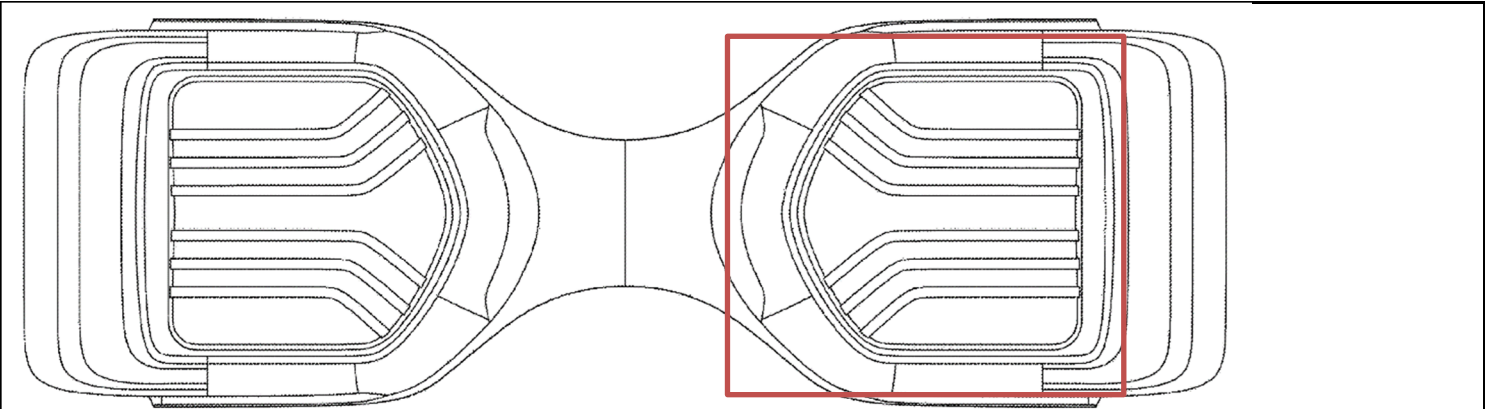
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 07/19/2021

By: Xie Rong Qing

**A. Top View Comparison**

Plaintiffs' Patents-in-Suit	
	
'D723 Patent	'D256 Patent
	
'D195 Patent	'D112 Patent

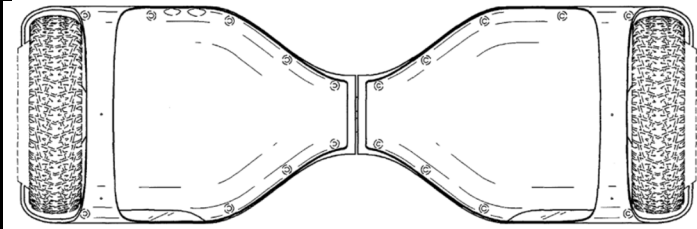
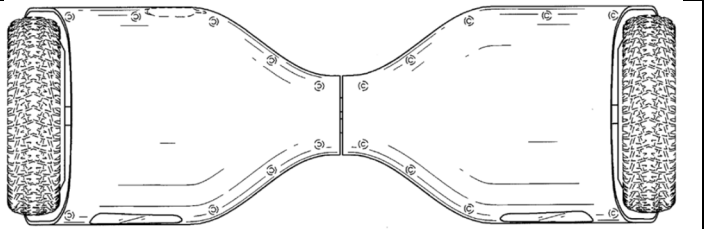
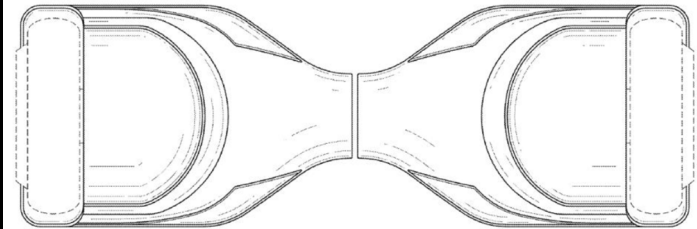
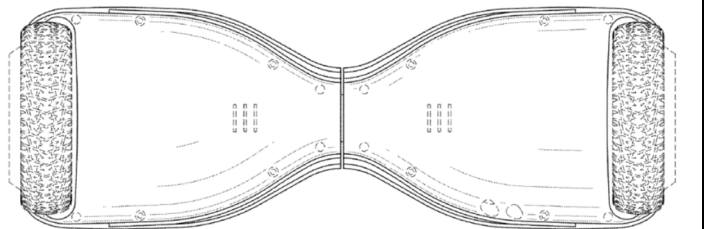


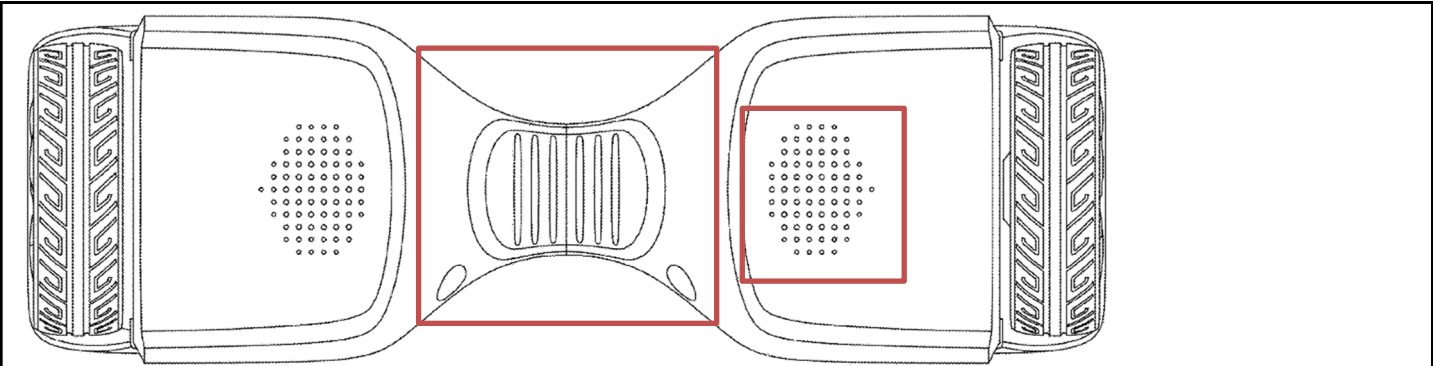

**The Licensed D808,857 Patent**



**The Accused Product**

**B. Bottom View Comparison**

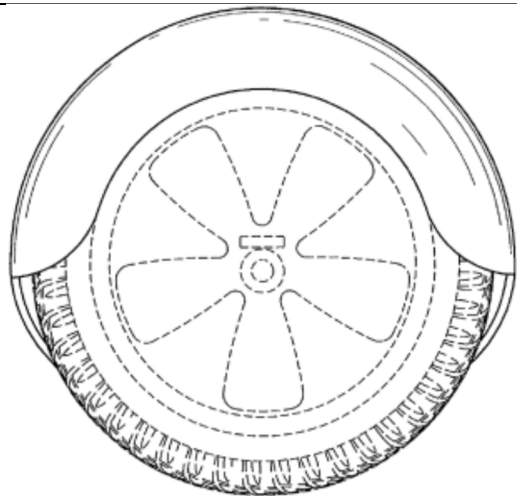
Plaintiffs' Patents-in-Suit	
	
'D723 Patent	'D256 Patent
	
'D195 Patent	'D112 Patent

	
<b>The Licensed D808,857 Patent</b>	
	
<b>The Accused Product</b>	



**C. Side View Comparison (Wheels)**

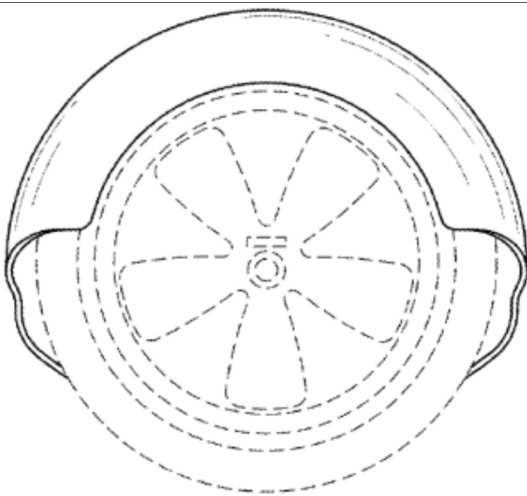
**Plaintiffs' Patents-in-Suit**



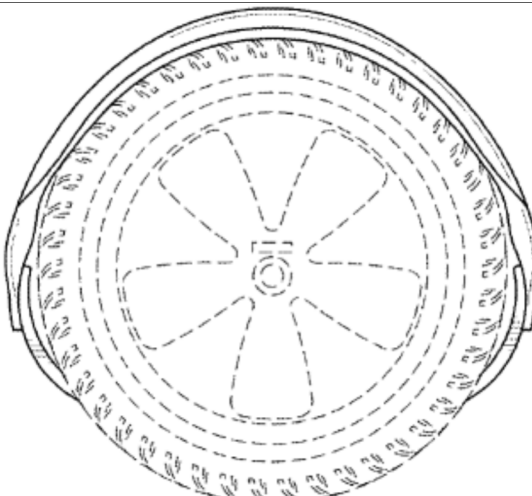
**'D723 Patent**



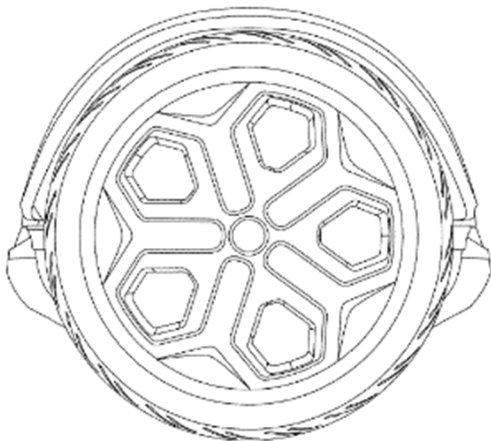
**'D256 Patent**



**'D195 Patent**



**'D112 Patent**



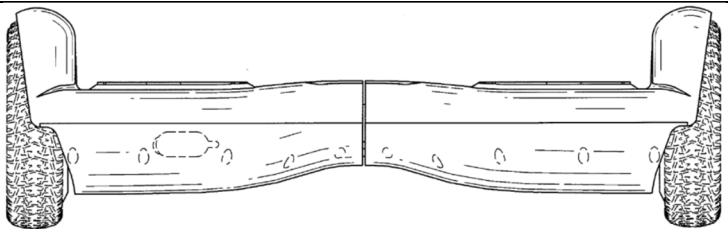
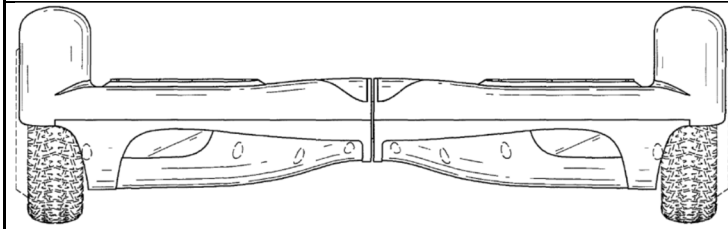
**The Licensed D808,857 Patent**



**The Accused Product**

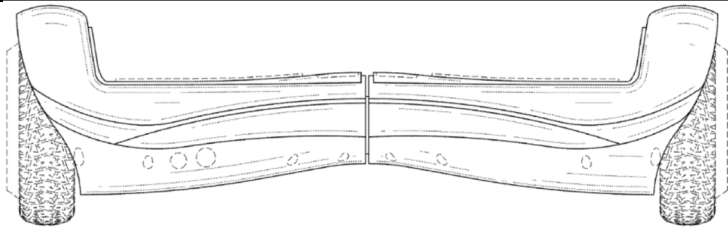
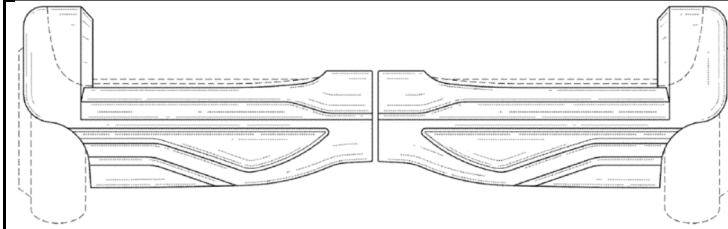
**D. Front / Back View Comparison**

**Plaintiffs' Patents-in-Suit**



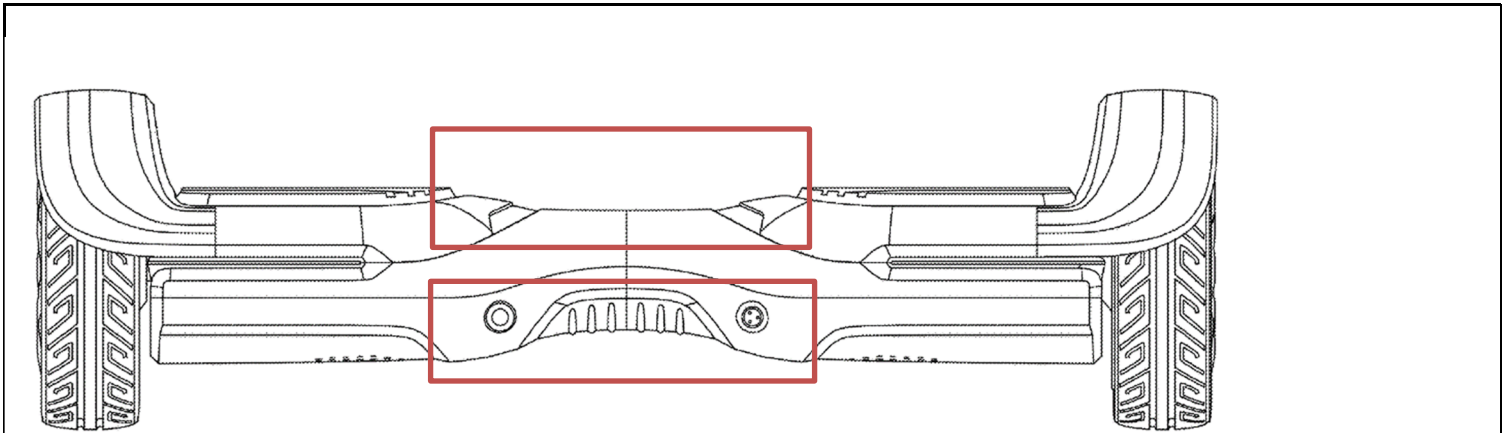
**'D723 Patent**

**'D256 Patent**



**'D195 Patent**

**'D112 Patent**

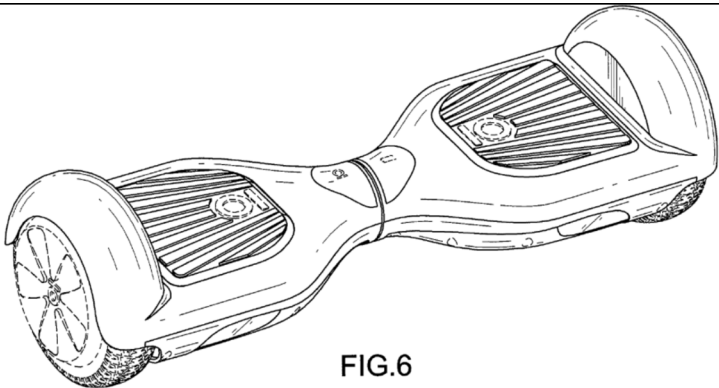
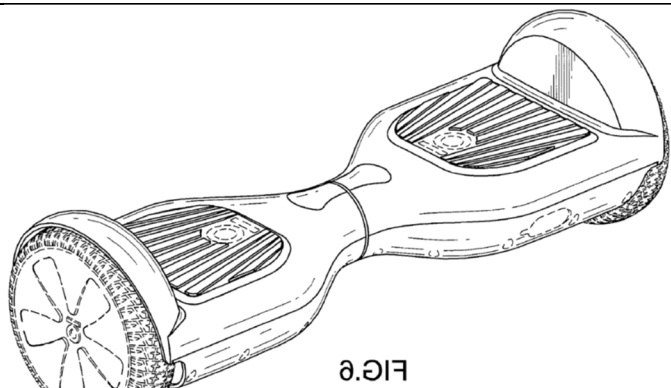
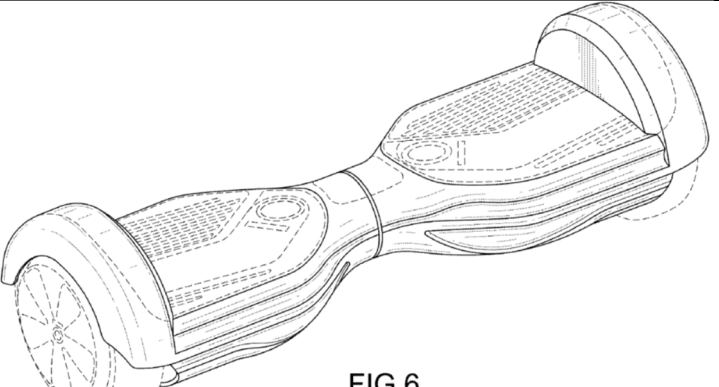
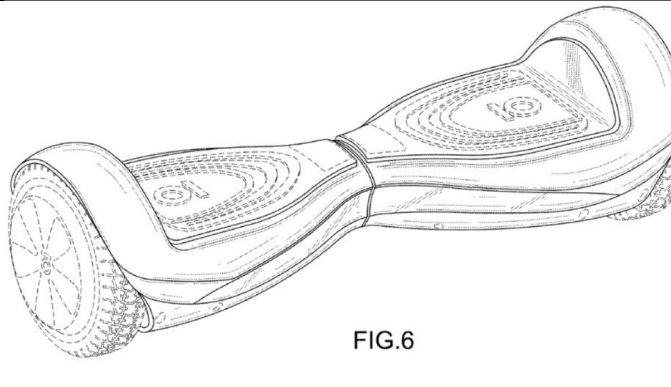
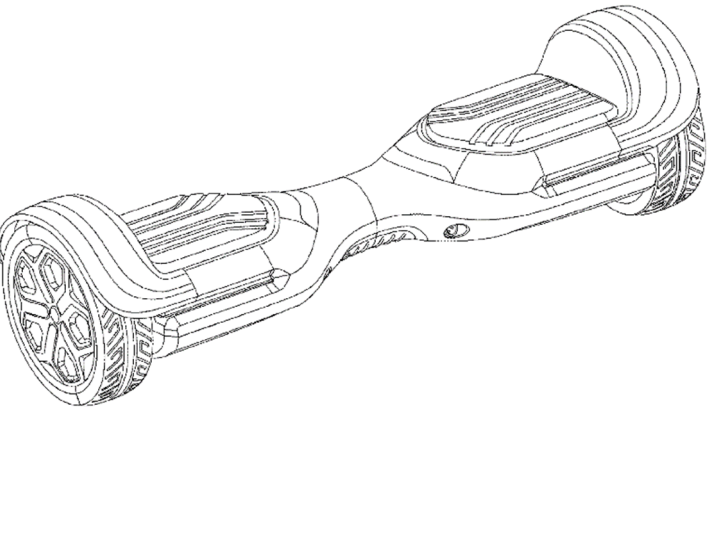



**The Licensed D808,857 Patent**



**The Accused Product**

**E. Perspective View Comparison**

Plaintiffs' Patents-in-Suit	
 <p>FIG. 6</p>	 <p>FIG. 6</p>
'D723 Patent	'D256 Patent
 <p>FIG. 6</p>	 <p>FIG. 6</p>
'D195 Patent	'D112 Patent
	
The Licensed D808,857 Patent	The Accused Product